

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

VIRGINIA INNOVATION SCIENCES, INC.,)	Case No. 1:16-cv-00861 (LO-MSN)
)	
Plaintiff,)	
)	
v.)	
)	
AMAZON.COM, INC.,)	
)	
Defendant.)	
_____)	

DEFENDANT’S MOTION TO FILE DOCUMENTS UNDER SEAL

Defendant Amazon.com, Inc. (“Amazon”), by counsel, hereby moves the Court to file under seal the following documents:

- Memorandum in Support of Amazon’s Motion for Reasonable Attorneys’ Fees Under 35 U.S.C. § 285;
- Declaration of Saina Shamilov in Support of Amazon’s Motion for Reasonable Attorneys’ Fees Under 35 U.S.C. § 285 and Exhibit B; and,
- Declaration of Mary C. Zinsner in Support of Amazon’s Motion for Reasonable Attorneys’ Fees Under 35 U.S.C. § 285 and Exhibit 2.

In support of this Motion, Amazon submits contemporaneously herewith a nonconfidential Memorandum in Support of Motion to File Documents Under Seal, along with a proposed Order.

Dated: February 14, 2018

Respectfully submitted,

AMAZON.COM, INC.

/s/ Laura Anne Kuykendall

Robert A. Angle (VSB No. 37691)

robert.angle@troutmansanders.com
Laura Anne Kuykendall (VSB No. 82318)
la.kuykendall@troutmansanders.com
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-1468
Facsimile: (804) 697-1339

Mary Catherine Zinsner (VSB No. 31397)
mary.zinsner@troutman.com
TROUTMAN SANDERS LLP
1850 Towers Crescent Plaza, Suite 500
Tysons Corner, VA 22182
Telephone: (703) 734-4363
Facsimile: (703) 734-4340

Of counsel:

J. David Hadden*
dhadden@fenwick.com
Saina Shamilov*
sshamilov@fenwick.com
Todd Gregorian*
tgregorian@fenwick
Jeffrey Ware*
jware@fenwick.com
Dargaye Churnet*
dchurnet@fenwick.com
Ravi Ranganath *
rranganath@fenwick.com
Sapna Mehta*
smehta@fenwick.com
Jessica M. Kaempf*
jkaempf@fenwick.com
FENWICK & WEST LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041
Telephone: (650) 988-8500
Facsimile: (650) 938-5200

**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which then will send automatic notification of such filing (NEF) to the following:

Shauna M. Wertheim (VSB No. 33690)
The Marbury Law Group, PLLC
11800 Sunrise Valley Drive, 15th Floor
Reston, VA 20191
Telephone: 571.267.7002
Fax: 703.391.2901
swertheim@marburylaw.com

William Eugene Bradley (VSB No. 42623)
Michael Best & Friedrich LLP
601 Pennsylvania Ave NW
Suite 700 South
Washington, DC 20004
Telephone: (202) 747-9560
Fax: (202) 347-1819
webradley@michaelbest.com

Counsel for Plaintiff Virginia Innovation Sciences, Inc.

/s/ Laura Anne Kuykendall

Robert A. Angle (VSB No. 37691)
robert.angle@troutmansanders.com
Laura Anne Kuykendall (VSB No. 82318)
la.kuykendall@troutmansanders.com
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-1468
Facsimile: (804) 697-1339

Mary Catherine Zinsner (VSB No. 31397)
mary.zinsner@troutman.com
TROUTMAN SANDERS LLP
1850 Towers Crescent Plaza, Suite 500
Tysons Corner, VA 22182
Telephone: (703) 734-4363
Facsimile: (703) 734-4340

Counsel for Defendant Amazon.com, Inc.